

### **REMARKS**

The present application is a CPA of Serial No. 09/466,724 filed on December 17, 1999.

In the accompanying request for filing a CPA, the amendments set forth in the response filed December 3, 2002 are requested to be formally entered and considered.

The present paper adds additional claims 28-32 to more particularly point out and distinctly claim the invention.

Specifically, new claim 28 defines the electrodeposition paint as comprising a combination of anionizable or cationizable external crosslinking base resin and curing agent or an internal crosslinking base resin. Support is found in the specification at page 10, lines 13-16.

New claim 28 is added in response to the Examiner's comments set forth at the bottom of page 2 of the Advisory Action. Accordingly, the subject matter of new claim 28 is deemed to clearly define the present invention over Luch.

Regarding the cited reference Lo, the Examiner's comments set forth on page 3 of the Advisory Action have been noted. However, claim 10 is nevertheless still deemed to be nonobvious from the teachings of the cited reference.

The invention of Lo is summarized in the paragraph bridging columns 1-2 of the patent. The Lo method involves first pre-coating the non-conductive, polymeric component of an automobile with an electro-conductive primer. The primer is cured, and then the primed polymer components are assembled with the conductive, metal components to form the automobile. The automobile is then submersed into an electrocoat bath for simultaneously electrocoating both the polymeric and metal components. Thus, Lo only teaches pre-coating the non-conductive, polymeric components with a precoat of an electro-conductive primer. There is no teaching or suggestion of coating the metal components with the conductive primer.

In contrast, the present invention is directed to a metal plate, which is precoated with a preformed conductive plastic film or sheet. Even if there is no weight given to the process language "preformed" in claim 10, the Examiner has still failed to point out any teaching or suggestion which would motivate one skilled in the art by the teachings of Lo to apply a conductive plastic film or sheet onto the surface of a metal plate substrate. The invention of Lo is

clearly distinguished from the claimed invention, which teaches pre-coating only non-conductive polymeric materials with a conductive primer.

Moreover, the Examiner is kindly requested to note that the present invention is directed to overcoming the problems resulting from the Lo process, of directly applying an electrodeposition paint to a conductive, metallic component. Please see page 1, lines 12-20 of the present specification.

Accordingly, the claimed invention is unobvious from Lo.

Moreover, the Examiner's attention is furthermore directed to the subject matter of claim 21, which requires that the preformed conductive plastic film or sheet be adhered to the metal plate using an adhesive. There is clearly no teaching or suggestion in Lo to motivate one skilled in the art to utilize an adhesive in applying a conductive precoat primer.

In view of the foregoing, claims 10-28 are deemed to be patentable over the teachings of the references cited in the previous Office Action.

New claims 29-32 are self-explanatory and are also deemed to patentably define these inventions over the previously cited references.

Favorable reconsideration and allowance is thus respectfully solicited.

Respectfully submitted,

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